

FILED

July 24, 2024

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: RR Deputy

Case No: SA:24-CR-00357-FB**UNITED STATES OF AMERICA****Plaintiff****v.****RONIN MICHAEL RHOADES****Defendant****INDICTMENT**

COUNT 1: 18 U.S.C. § 933
Conspiracy to Traffic Firearms

COUNT 2: 18 U.S.C. § 932
Conspiracy to Straw Purchase Firearms

COUNT 3: 18 U.S.C. § 922(a)(1)(A)
Dealing in Firearms Without a License

THE GRAND JURY CHARGES:**COUNT ONE**

**[Conspiracy to Traffic Firearms]
[18 U.S.C. § 933]**

From on or about October 1, 2022, to on or about April 3, 2024, in the Western and Southern Districts of Texas, Defendant,

RONIN MICHAEL RHOADES,

and others, did knowingly conspire to ship, transport, transfer, cause to be transported, and otherwise dispose of any firearm, including, but not limited to, FN SCAR rifles, AR-style rifles, AK-style rifles, Beretta pistols, Glock pistols, and a Barrett .50 caliber rifle, to another person in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, to wit, Conspiracy to Smuggle Goods from the United States, in violation of Title 18, United States Code, Section 933(a)(3).

COUNT TWO
[Conspiracy to Straw Purchase Firearms]
[18 U.S.C. § 932]

From on or about October 1, 2022, to on or about April 3, 2024, in the Western and Southern Districts of Texas, Defendant,

RONIN MICHAEL RHOADES,

and others, did knowingly conspire to purchase a firearm in and affecting interstate and foreign commerce, including, but not limited to, FN SCAR rifles, AR-style rifles, AK-style rifles, Beretta pistols, Glock pistols, and a Barrett .50 caliber rifle, for, on behalf of, and at the request and demand of any other person, knowing and having reasonable cause to believe that such other person intended to use, carry, possess, sell and otherwise dispose of the firearm in furtherance of a felony, to wit, Conspiracy to Smuggle Goods from the United States, in violation of Title 18, United States Code, Section 932.

COUNT THREE
[Dealing in Firearms Without a License]
[18 U.S.C. § 922(a)(1)(A)]

From on or about October 1, 2022, to on or about April 3, 2024, in the Western District of Texas, Defendant,

RONIN MICHAEL RHOADES,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Firearm Violations and Forfeiture Statutes
[Title 18 U.S.C. §§ 933 and 932, subject to forfeiture pursuant to
Title 18 U.S.C. § 934(a)(1)(A) and (B)]

As a result of the criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. Forfeiture and Fines.

(a) Forfeiture. --

(1) In general. -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

II.

Firearms Violation and Forfeiture Statutes
[Title 18 U.S.C. § 922(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Count Three, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which state:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (a) . . . of section 922. . . shall be subject to seizure and forfeiture. . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following property:

1. Kel-Tec model KS7 shotgun, 12 ga. caliber, serial number Q8W61;
2. Glock model 26 pistol, 9x19mm caliber, serial number BXAR027;
3. Riley Defense model RAK-74 rifle, 5.45x39mm caliber, serial number C03508;

4. Lee Armory model LA-AKM rifle, 7.62x39mm caliber, serial number LA000224;
5. FN model SCAR 17S rifle, 7.62x51mm caliber, serial number H0C21461;
6. Romarm/Cugir model Draco rifle, 7.62x39mm caliber, serial number DB-8314-18;
7. LMT Defense model Defender 2000 rifle, 5.56x45mm caliber, serial number LMT88952;
8. Palmetto State Armory model PSAK47 rifle, 7.62x39mm caliber, serial number AKB060767;
9. Geissele Automatics model Super Duty SD-556 rifle, 5.56x45mm caliber, serial number SD556-2000356;
10. Romarm/Cugir model WASR-10 rifle, 7.62x39mm caliber, serial number A1-38663-15;
11. Wilson Combat no model AR-15-style rifle, 5.56x45mm caliber, serial number WCPL03422;
12. FN model SCAR 17S rifle, 7.62x51mm caliber, serial number H0C27131;
13. Anderson Manufacturing model AM-15 rifle, 5.56x45mm caliber, serial number 23107734;
14. Glock model 17 Gen 5 pistol, 9x19mm caliber, serial number BZZW444;
15. Glock model 19 pistol, 9x19mm caliber, serial number BCVT002;
16. Smith and Wesson model 437-2 Airweight Revolver, .38 Special caliber, serial number DEB4527;
17. Maverick Arms model 88 shotgun, 12 ga. caliber, serial number MV0877909; and
18. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: 
FOR WILLIAM F. CALVE
Assistant United States Attorney